

RECEIVED
CENTRAL FAX CENTER

Serial No. 10/694,530

OCT 31 2006

Docket No.: SANZ-251

REMARKS

Reconsideration of this application, as amended, is respectfully requested.

It is not believed that the objections to claims 15, 17 and 20 apply to the presently pending claims.

Claims 10 and 12 were rejected under 35 U.S.C. § 102(e) for allegedly anticipated by Berthaud et al (US 6,625,736). Applicants respectfully traverse, as it is not believed that this rejection applies to the presently pending claims.

Berthaud discloses to a method and device comprising a plurality of voltage sources which can be connected to a plurality of consumers. If a certain voltage source fails or breaks down, the consumer connected to this failing voltage source shall be connected to other voltage sources so that the whole system can still work.

The voltages of the voltage sources are adjusted to fixed voltage values, e.g. 3,3 V; 5 V, -48 V and +12 V DC; these are the voltages used by computers. However, Berthaud does not disclose that voltage sources are connected in view of the power required by a consumer.

When comparing the respective Figs. 1 of the cited reference and the present application the different arrangements are apparent. According to the present invention the consumers are connected with the control unit 36 only which distributes the power of the power block. In contrast, Berthaud discloses the voltage sources as well as the consumers comprise storages (EEPROM, col. 4, lines 4-38) which receive information on the capacity or the power required. Accordingly, the voltage sources and the consumers are connected to each other via a data bus, since the consumers require a certain power and the voltage sources indicate their respective available powers.

Still, in Berthaud the consumers have different priorities. If the system reaches the limits of its powers, the consumers having lower priorities are switched off. In the present invention such a situation cannot appear, since the power block is configured such that there is always sufficient power available for any process; no consumer will be switched off.

Serial No. 10/694,530

Docket No.: SANZ-251

Furthermore, Berthaud does not disclose the feature "where $m < n$ ", and the Examiner has given no evidence for his statement.

Berthaud also fail to disclose the feature "whereby the sum of the power supplyable by the k energy modules is smaller than the power which would be necessary, if all n consumers simultaneously required electrical power". A computer would not have such a feature because all consumers must be supplied by electrical power at any time.

Berthaud also does not disclose the feature "a control is provided which connects as many energy modules to respective one of the m consumers, so that this consumer receives the power required by said consumer". Column 3, lines 15-48 cited by the Examiner disclose a "set of linear inequations linking each variable $P_{v1}, P_{v2} \dots P_{vm}$ " which does not relate to the present invention.

In view of the foregoing, this rejection should be withdrawn.

All of the remaining rejections are based on Berthaud in view of various secondary references, and are believed to fail in view of the deficiencies of Berthaud described above and are not believed to apply to the presently pending claims.

US 5,584,974 (Sellers) discloses an arc control and switching element protection for pulsed DC cathode sputtering power supply. Sellers does not disclose a plurality of sputter installations, whereby each sputter installation has its own arc management. Col. 4, lines 25-28 cited by the Examiner merely states that "[i]t is an object of this invention to enhance sputtering or other plasma chamber operation in a fashion which detects and deals with arcing or overvoltage condition, and which avoids the problem of the prior art." It is respectfully submitted that this statement does not relate to a plurality of sputter installations.

Furthermore, Sellers teaches a DC pulse generator, but does not disclose a plurality of cathodes.

Serial No. 10/694,530

Docket No.: SANZ-251

Lau relates to an electronic ballast circuit for a fluorescent light. Canceled claim 13 related to now canceled claim 10, i.e., the energy modules supply AC current. It is respectfully submitted that those skilled in the art would never have combined Berthaud with Lau, because the circuit of Lau cannot be controlled. Moreover, Berthaud requires DC (col, 1, lines 37/38), and the examiner has not provided any reason why should AC be implemented with the invention of Berthaud. Thus Lau should not be combined with Berthaud because there is no motivation to do so.

Mahler describes an apparatus for coating and/or etching substrates in a vacuum chamber. Col. 2, lines 43-49 of Mahler, which were cited by the Examiner, does not disclose that each cathode is provided with its own adaptation network.

Katz discloses a power supply for a fixed number of consumers by means of a plurality of voltage sources, whereby each consumer is always connected to a combination of two different voltage sources. As will be understood from the drawings, for n consumers always $2 \cdot \sqrt{n}$ voltage sources are provided. Katz does not disclose to connect different voltage sources so as to provide single customers with more power.

Milde also fails to overcome the deficiencies of Berthaud.

In sum, none of the references cited by the Examiner anticipates or renders obvious each of the features of any of the claims.

In view of the foregoing allowance is respectfully requested.

Serial No. 10/694,530

Docket No.: SANZ-251

If any fees are due for entry of this amendment, authorization is given to charge deposit account no: 50-0624.

If any extensions of time are required, please consider this a petition therefore and charge the petition fee to said deposit account.

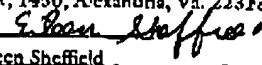
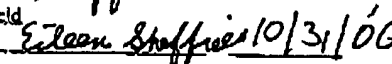
Respectfully submitted,

By 

C. Andrew Im

Registration No.: 40,657

Fulbright & Jaworski L.L.P.
666 Fifth Avenue
New York, NY 10103
212-318-3000

I hereby certify that this correspondence is being transmitted by facsimile to (571) 273-8300 to: Commissioner for Patents, P.O. Box, 1450, Alexandria, Va. 22313-14350 on the date show below	
 Eileen Sheffield	 Eileen Sheffield
Signature	Date 10/31/06